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10 *Attorneys for Debtors*

11
12 **IN THE UNITED STATES BANKRUPTCY COURT FOR THE**
13 **EASTERN DISTRICT OF CALIFORNIA (SACRAMENTO DIVISION)**

14 In re JESUS MANUEL COSIO and
15 ANGELICA MENDEZ COSIO,

16 Debtors,

17 No. 14-25804
18 DC No. JMC-2

19 Chapter 7

20 Judge Christopher J. Jaime

21 **NOTICE OF MOTION TO CLOSE**
22 **BANKRUPTCY**

23 Hearing Date: April 14, 2015

24 Time: 9:30 a.m.

25 Courtroom: 32

26 United States Bankruptcy Court

27 Eastern District of California

28 501 I Street

29 Sixth Floor, Department B

30 Sacramento, California 90012

31 **NOTICE OF MOTION TO MOTION TO CLOSE BANKRUPTCY**

32 NOTICE IS HEREBY GIVEN that Jesus Manuel Cosio and Angelica
33 Mendez Cosio (“Debtors”) will and hereby do move to re-close the bankruptcy in
34 the above referenced proceedings under 11 U.S.C. § 350(b) and Federal Rule of
35 Bankruptcy Procedure 5010 on April 14, 2015 at 9:30 a.m., or as soon thereafter as
36 counsel may be heard by the above-entitled Court, located at Courtroom 32, 501 I
37 Street, Sixth Floor, Department B, Sacramento, California 90012, before the
38 Honorable Christopher J. Jaime. Plaintiffs’ requested relief is set forth below and in
39 the attached Motion.

40 On Debtors’ Motion, the Court ordered their bankruptcy re-opened and re-

1 appointed a trustee to administer any assets. (ECF Nos. 22, 23, 24.) This order
 2 provided an opportunity for the Debtors to amend their bankruptcy schedules to
 3 disclose an asset (i.e., newly-discovered legal claims), and for the trustee to
 4 administer that asset if he so chose. Based on communications from the trustee
 5 (including a March 12, 2015 telephone conversation with co-counsel), Debtors
 6 understand that the trustee will not seek to further administer any property in the
 7 estate (including the claims listed in Debtors' amended bankruptcy schedules).
 8 Debtors understand that the trustee does not intend to administer the asset disclosed
 9 in their amended bankruptcy schedules. Hence, Debtors intend to re-close the
 10 bankruptcy so that the trustee abandons the claim under operation of law and it will
 11 default back to them.

12 Debtors have provided less than twenty-eight (28) days prior to the hearing
 13 date on the Motion. No written opposition is required in advance of this hearing:

14 When fewer than twenty-eight (28) days' notice of a hearing is given,
 15 no party-in-interest shall be required to file written opposition to the
 16 motion. Opposition, if any, shall be presented at the hearing on the
 17 motion. If opposition is presented, or if there is other good cause, the
 18 Court may continue the hearing to permit the filing of evidence and
 19 briefs.

20 LBR 9014-1(f)(2)(C).

21 WHEREFORE, Debtors respectfully request the Court re-close the Debtors'
 22 bankruptcy case, and grant such other and further relief as is appropriate and just.

23 Dated: March 27, 2015

24 By: s/Zack Broslavsky

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